

# **EXHIBIT B**

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(Additional counsel on signature page)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

Case No. 20-CV-08570-LHK

The Hon. Lucy H. Koh

**CLASS ACTION**

**ADVERTISER PLAINTIFFS' RULE  
26(a)(1)(A) FIRST AMENDED INITIAL  
DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), Advertiser Plaintiffs Affilious, Inc.; Jessyca Frederick; Mark Young; Joshua Jeon; 406 Property Services, PLLC; Mark Berney; Katherine Looper; and Zahara Mossman hereby provide their First Amended Initial Disclosures to Defendant Facebook, Inc. (“Defendant” or “Facebook”). Advertiser Plaintiffs (through their attorneys) continue their investigation into the claims alleged in this action and make these disclosures based solely on information reasonably available to them at this time.

As of the date of these amended initial disclosures, Defendants have not answered the Consolidated Advertiser Class Action Complaint (“CAC”). Pursuant to Federal Rule of Civil Procedure 26(e)(1), Advertiser Plaintiffs will supplement these amended initial disclosures, as appropriate, when additional information becomes known to them, and Advertiser Plaintiffs expressly reserve their right to do so.

Advertiser Plaintiffs do not waive any applicable privilege or protection and reserve the right to object to the production in discovery and/or admissibility at trial of any information contained in or derived from these disclosures.

**I. FED. R. CIV. P. 26(a)(1)(A)(i): INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT ADVERTISER PLAINTIFFS MAY USE TO SUPPORT THEIR CLAIMS**

Subject to the foregoing limitations, the tables below list persons who are likely to have discoverable information that Advertiser Plaintiffs may use to support their claims against Defendants. Advertiser Plaintiffs reserve the right to rely on individuals identified in these disclosures for subjects other than those identified herein.

**A. Advertiser Plaintiffs**

Name	Subject of Discoverable Information
Affilious, Inc. c/o Scott+Scott Attorneys at Law LLP 230 Park Avenue, 17th Floor New York, NY 10169 (212) 223-6444 and Bathaee Dunne LLP 445 Park Avenue, 9th Floor	Information regarding Affilious Inc.’s purchase of advertising on Facebook’s self-service advertising platform and knowledge of its causes of action

1	New York, NY 10022 (332) 322-8835	
2	Jessyca Frederick	
3	c/o Scott+Scott Attorneys at Law LLP	
4	230 Park Avenue, 17th Floor	
5	New York, NY 10169	Information regarding Jessyca Frederick's purchase
6	(212) 223-6444	of advertising on Facebook's self-service
7	and	advertising platform and knowledge of her causes
8	Bathae Dunne LLP	of action
9	445 Park Avenue, 9th Floor	
10	New York, NY 10022	
11	(332) 322-8835	
12	Mark Young	
13	c/o Scott+Scott Attorneys at Law LLP	
14	230 Park Avenue, 17th Floor	
15	New York, NY 10169	Information regarding Mark Young's purchase of
16	(212) 223-6444	advertising on Facebook's self-service advertising
17	and	platform and knowledge of his causes of action
18	Bathae Dunne LLP	
19	445 Park Avenue, 9th Floor	
20	New York, NY 10022	
21	(332) 322-8835	
22	Joshua Jeon	
23	c/o Scott+Scott Attorneys at Law LLP	
24	230 Park Avenue, 17th Floor	
25	New York, NY 10169	Information regarding Joshua Jeon's purchase of
26	(212) 223-6444	advertising on Facebook's self-service advertising
27	and	platform and knowledge of his causes of action
28	Bathae Dunne LLP	
	445 Park Avenue, 9th Floor	
	New York, NY 10022	
	(332) 322-8835	
	406 Property Services, PLLC	
	c/o Scott+Scott Attorneys at Law LLP	
	230 Park Avenue, 17th Floor	
	New York, NY 10169	Information regarding 406 Property Services,
	(212) 223-6444	PLLC's purchase of advertising on Facebook's self-
	and	service advertising platform and knowledge of its
	Bathae Dunne LLP	causes of action
	445 Park Avenue, 9th Floor	
	New York, NY 10022	
	(332) 322-8835	

1 2 3 4 5 6	Mark Berney c/o Scott+Scott Attorneys at Law LLP 230 Park Avenue, 17th Floor New York, NY 10169 (212) 223-6444 and Bathae Dunne LLP 445 Park Avenue, 9th Floor New York, NY 10022 (332) 322-8835	Information regarding Mark Berney's purchase of advertising on Facebook's self-service advertising platform and knowledge of his causes of action
7 8 9 10 11 12	Katherine Looper c/o Scott+Scott Attorneys at Law LLP 230 Park Avenue, 17th Floor New York, NY 10169 (212) 223-6444 and Bathae Dunne LLP 445 Park Avenue, 9th Floor New York, NY 10022 (332) 322-8835	Information regarding Katherine Looper's purchase of advertising on Facebook's self-service advertising platform and knowledge of her causes of action
13 14 15 16 17 18	Zahara Mossman c/o Scott+Scott Attorneys at Law LLP 230 Park Avenue, 17th Floor New York, NY 10169 (212) 223-6444 and Bathae Dunne LLP 445 Park Avenue, 9th Floor New York, NY 10022 (332) 322-8835	Information regarding Zahara Mossman's purchase of advertising on Facebook's self-service advertising platform and knowledge of her causes of action

**B. Defendant**

Name	Subject of Discoverable Information
Facebook, Inc. c/o Wilmer Cutler Pickering Hale and Dorr LLP 2600 El Camino Real, Suite 400 Palo Alto, California 94306 (650) 858-6000	As the sole defendant, Facebook has discoverable information relating to all allegations contained in Plaintiffs' CAC.

In addition to Facebook, there are numerous current and former officers, directors, and employees of Facebook who are likely to have discoverable information that Advertiser Plaintiffs may use to support their claims.

Name	Subject of Discoverable Information
<p><u>Ime Archibong</u> Current Head of New Product Experimentation; Former VP, Product Partnerships</p>	<p>Mr. Archibong is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and its data collection and use practices; and/or Facebook's monetization strategy.</p>
<p><u>Jackie Chang</u> Current Director of Platform Product Partnerships; Former Head of Business Platform Partnerships; Former Manager, Internet.org and Mobile Inclusion Partnerships; Former Strategic Partner Manager, Social Commerce and Developer Platform; Former Global Account Manager, National Direct Sales; Former User Operations</p>	<p>Ms. Chang is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and its data collection and use practices; and/or Facebook's monetization strategy.</p>
<p><u>Christopher Cox</u> Chief Product Officer; VP of Product</p>	<p>Mr. Cox is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's mobile strategy; and/or Facebook's monetization strategy.</p>
<p><u>Calvin Chin</u> Current Data Science Analyst, WhatsApp; Former Market Strategist; Former Core Data Science Analyst, Onavo</p>	<p>Mr. Chin is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's and Onavo's</p>

1		data collection and use practices; Platform Policy and Partnership Agreements; and/or the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices.
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4	<u>Simon Cross</u>	Mr. Cross is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy, Programming, and Partnership Agreements; Facebook's data collection and use practices; and/or the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices.
5	Current Director of Product, Community Integrity; Former Manager, Product Management, Workplace; Former Products Manager, Platform	
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11	<u>Thomas Cunningham</u>	Mr. Cunningham is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; and/or Facebook's data collection and use practices;
12	Current Core Data Scientist and Economist; Former Data Scientist	
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16	<u>Chris Daniels</u>	Mr. Daniels is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; and/or Facebook's monetization strategy.
17	Former VP, WhatsApp; Former VP, Internet; Former VP, Partnerships; Former Director of Business Development	
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23	<u>Vladimir Federov</u>	Mr. Federov is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy, Programming, and Partnership Agreements; and/or the representations Facebook made to the public
24	Current Senior VP of Privacy Engineering and Product; Former VP of Engineering; Former Engineering Director; Former Engineering Manager; Former Engineer on Platform	
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1		regarding the Platform, and its data collection and use practices.
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3	<u>Allision Hendrix</u>	Ms. Hendrix is likely to have discoverable
4	Current Public Policy Director on Privacy and	information regarding social networks and
5	Data Policy; Former Head of Data Policy	social media applications; Facebook's serial
6	Management	acquisition strategy; Facebook's use of
7		consumer data to evaluate Facebook's
8		competitive performance; Facebook's
9		Platform Policy and Partnership Agreements;
10		Facebook's data collection and use practices;
11		the representations Facebook made to the
12		public regarding the Platform, and
13		Facebook's data collection and use practices;
14		and/or Facebook's monetization strategy.
15	<u>Neha Jogani</u>	Ms. Jogani is likely to have discoverable
16	Former Director, Consumer and Developer	information regarding social networks and
17	Marketing; Former Head of Developer	social media applications; Facebook's serial
18	Marketing; Former Monetization Marketing	acquisition strategy; Facebook's advertising
19		business practices; agreements with
20		competitors and potential competitors
21		(including the Google Network Bidding
22		Agreement); Facebook's use of consumer
23		data to evaluate Facebook's competitive
24		performance; Facebook's Platform Policy and
25		Partnership Agreements; Facebook's data
26		collection and use practices; the
27		representations Facebook made to the public
28		regarding the Platform, and Facebook's data
		collection and use practices; and/or
		Facebook's monetization strategy.
	<u>Johanna Peace</u>	Ms. Peace is likely to have discoverable
	Current Manager, Technology	information regarding social networks and
	Communications; Former Associate Manager,	social media applications; Facebook's serial
	Technology Communications	acquisition strategy; Facebook's use of
		consumer data to evaluate Facebook's
		competitive performance; Facebook's
		Platform Policy and Partnership Agreements;
		Facebook's data collection and use practices;
		and/or the representations Facebook made to
		the public regarding the Platform, and
		Facebook's data collection and use practices.
	<u>Bryan Klimt</u>	Mr. Klimt is likely to have discoverable



1 2 3 4 5 6	Former Software Engineer	information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy, Programming, and Partnership Agreements; and/or the representations Facebook made to the public regarding the Platform, and its data collection and use practices.
7 8 9 10 11 12	<u>Kevin Lacker</u> Former Engineering Manager	Mr. Lacker is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy, Programming, and Partnership Agreements; and/or the representations Facebook made to the public regarding the Platform, and its data collection and use practices.
13 14 15 16 17 18 19 20 21 22	<u>Gareth Lambe</u> Current Head of Facebook Ireland; Current BOD; Former VP, International Sales Operations; Former Director, Sales, Planning, & Operations EMEA; Former Director, Advertising Operations EMEA	Mr. Lambe is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; and/or Facebook's monetization strategy.
23 24 25 26 27 28	<u>Francis Larkin</u> Former Director of Product Marketing	Mr. Larkin is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and

1		Facebook's data collection and use practices; and/or Facebook's monetization strategy.
2	<u>George Lee</u>	Mr. Lee is likely to have discoverable
3	Current Director of Product Management;	information regarding social networks and
4	Former Product Manager, Payments	social media applications; Facebook's use of
5		consumer data to evaluate Facebook's
6		competitive performance; Facebook's
7		Platform Policy, Programming, and
8		Partnership Agreements; and/or the
9		representations Facebook made to the public
10		regarding the Platform, and its data collection
11		and use practices.
12	<u>Samuel Lessin</u>	Mr. Lessin is likely to have discoverable
13	Former VP, Product Management; Former	information regarding social networks and
14	Director of Product Management, Identity	social media applications; Facebook's use of
15	Product Group	consumer data to evaluate Facebook's
16		competitive performance; Facebook's serial
17		acquisition strategy; Facebook's Platform
18		Policy and Partnership Agreements;
19		agreements with competitors and potential
20		competitors (including the Google Network
21		Bidding Agreement); Facebook's data
22		collection and use practices; the
23		representations Facebook made to the public
24		regarding the Platform, and Facebook's data
25		collection and use practices; Facebook's
26		monetization strategy; and/or the effects that
27		Facebook's conduct had on competing social
28		networks and social media applications.
19	<u>Ling Bao</u>	Ms. Bao is likely to have discoverable
20	Former Product Manager; Former Data	information regarding social networks and
21	Scientist	social media applications; Facebook's use of
22		consumer data to evaluate Facebook's
23		competitive performance; Facebook's serial
24		acquisition strategy; Facebook's data
25		collection and use practices; Platform Policy
26		and Partnership Agreements; and/or the
27		representations Facebook made to the public
28		regarding the Platform, and Facebook's data
		collection and use practices.
	<u>Deb Liu</u>	Ms. Liu is likely to have discoverable
	Former VP, Platform and Marketplace;	information regarding social networks and
	Former Director, Product Management;	social media applications; Facebook's serial

1 2 3 4 5 6	Former Product Management; Product Marketing	acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; and/or Facebook's monetization strategy.
7 8 9 10 11 12 13	<u>Monica Mosseri</u> Former Product Partnerships Manager; Former Platform Operations Team Lead; Former Platform Operations Associate; Former User Operations Specialist	Ms. Mosseri is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and its data collection and use practices; and/or Facebook's monetization strategy.
14 15 16 17 18 19 20 21 22 23 24	<u>Javier Olivan</u> Current VP, Central Products; Former Head of International Growth	Mr. Olivan is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.
25 26 27 28	<u>Eddie O'Neil</u> Current Director of Product Management; Former Product Manager	Mr. O'Neil is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's

1		Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and its data collection and use practices; and/or Facebook's monetization strategy.
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5	<u>Justin Osofsky</u>	Mr. Osofsky is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and its data collection and use practices; and/or Facebook's monetization strategy.
6	Current COO of Instagram and VP of Global Operations; Former Director Partnerships & Operations	
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14	<u>Konstantinos Papamiltiadis</u>	Mr. Papamiltiadis is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and its data collection and use practices; and/or Facebook's monetization strategy.
15	Current VP, Platform Partnerships; Former Director, Platform Partnerships; Former Strategic Partner Manager	
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22	<u>David Poll</u>	Mr. Poll is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy, Programming, and Partnership Agreements; and/or the representations Facebook made to the public regarding the Platform, and its data collection and use practices.
23	Former Software Engineer	
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<p><u>Doug Purdy</u> Former Director of Engineering Platform / Director of Engineering; Former Director of Developer Relations</p>	<p>Mr. Purdy is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.</p>
<p><u>Tera Randall</u> Former Communications Director for Developer and Commerce Platforms</p>	<p>Ms. Randall is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; and/or the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices.</p>
<p><u>Dan Rose</u> Former VP, Partnerships</p>	<p>Mr. Rose is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that</p>

1		Facebook's conduct had on competing social networks and social media applications.
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3	<u>Guy Rosen</u>	Mr. Rosen is likely to have discoverable
4	Current VP, Integrity and Product	information regarding social networks and
5	Management; Founder and Former CEO,	social media applications; Facebook's use of
6	Onavo	consumer data to evaluate Facebook's
7		competitive performance; Facebook's serial
8		acquisition strategy; Facebook's and Onavo's
9		data collection and use practices; the
10		representations Facebook made to the public
11		regarding its data collection and use practices;
12		and/or the effects that Facebook's conduct
13		had on competing social networks and social
14		media applications.
15	<u>Sheryl Sandberg</u>	Mr. Rose is likely to have discoverable
16	Current COO	information regarding social networks and
17		social media applications; Facebook's use of
18		consumer data to evaluate Facebook's
19		competitive performance; Facebook's serial
20		acquisition strategy; Facebook's advertising
21		business practices; Facebook's Platform
22		Policy and Partnership Agreements;
23		agreements with competitors and potential
24		competitors (including the Google Network
25		Bidding Agreement); Facebook's data
26		collection and use practices; the
27		representations Facebook made to the public
28		regarding the Platform, and Facebook's data
		collection and use practices; Facebook's
		monetization strategy; and/or the effects that
		Facebook's conduct had on competing social
		networks and social media applications.
	<u>Fidji Simo</u>	Ms. Simo is likely to have discoverable
	Current Head of the Facebook App; Former	information regarding social networks and
	VP of Video Games and Monetization;	social media applications; Facebook's use of
	Former Director of Product Management;	consumer data to evaluate Facebook's
	Former Product Management; Former	competitive performance; Facebook's serial
	Product Marketing	acquisition strategy; Facebook's data
		collection and use practices; the
		representations Facebook made to the public
		regarding its data collection and use practices;
		and/or the effects that Facebook's conduct had
		on competing social networks and social
		media applications.

<p><u>Ilya Sukhar</u> Former Head of Developer Products</p>	<p>Mr. Sukhar is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy, Programming, and Partnership Agreements; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.</p>
<p><u>David Swain</u> Former Head of Global Communications, IG; Former Director of Technology Communications</p>	<p>Mr. Swain is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; and/or the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices.</p>
<p><u>Jennifer Taylor</u> Former Manager, Platform Product Marketing</p>	<p>Ms. Taylor is likely to have discoverable information regarding social networks and social media applications; Facebook's serial acquisition strategy; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; and/or the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices.</p>



<p><u>Jonathon “Jonny” Thaw</u> Former Director of Product Marketing, AR/VRTech Platforms, Privacy and Research; Former VP of Product Communications; Former Director of Executive and Product Communications; Former Director of Policy Communications; Director of Product and Tech Communications; Former Manager of Corporate and Financial Communications</p>	<p>Mr. Thaw is likely to have discoverable information regarding social networks and social media applications; Facebook’s serial acquisition strategy; Facebook’s use of consumer data to evaluate Facebook’s competitive performance; Facebook’s Platform Policy and Partnership Agreements; Facebook’s data collection and use practices; and/or the representations Facebook made to the public regarding the Platform, and Facebook’s data collection and use practices.</p>
<p><u>Roi Tiger</u> Current Director Engineering; Founder and Former CTO, Onavo</p>	<p>Mr. Tiger is likely to have discoverable information regarding social networks and social media applications; Facebook’s use of consumer data to evaluate Facebook’s competitive performance; Facebook’s serial acquisition strategy; Facebook’s and Onavo’s data collection and use practices; the representations Facebook made to the public regarding its data collection and use practices; and/or the effects that Facebook’s conduct had on competing social networks and social media applications.</p>
<p><u>Mike Vernal</u> Former VP of Products &amp; Engineering; Former Platform Policy Team Lead</p>	<p>Mr. Vernal is likely to have discoverable information regarding social networks and social media applications; Facebook’s use of consumer data to evaluate Facebook’s competitive performance; Facebook’s serial acquisition strategy; Facebook’s Platform Policy and Partnership Agreements; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook’s data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook’s data collection and use practices; Facebook’s monetization strategy; and/or the effects that Facebook’s conduct had on competing social networks and social media applications.</p>
<p><u>Ash Wahi</u></p>	<p>Mr. Wahi is likely to have discoverable information regarding social networks and</p>



<p>Former Advertising Manager; Former Product, Timeline, and Open Graph Partnerships</p>	<p>social media applications; Facebook's serial acquisition strategy; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's Platform Policy and Partnership Agreements; Facebook's data collection and use practices; and/or the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices.</p>
<p><u>Rose Yao</u> Current Senior Director of Product Management, Google; Former FB Group Project Manager; Former Open Graph Permissions for Apps Product Manager</p>	<p>Ms. Yao is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.</p>
<p><u>Mark Zuckerberg</u> Founder and Current CEO</p>	<p>Mr. Zuckerberg is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; the effects</p>

1		that Facebook's conduct had on competing social networks and social media applications; and/or Facebook's monetization strategy.
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4	<u>Amin Zoufonoun</u>	Mr. Zoufonoun is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.
5	Current Vice President, Corporate Development	
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15	<u>David Fisch</u>	Mr. Fisch is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.
16	Former Director, Platform Partnerships;	
17	Former Director, Business Development	
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26	<u>Sean Ryan</u>	Mr. Ryan is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's
27	Former VP, Business Platform Partnerships;	
28	Former Director, Games Partnerships	

1		competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.
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10	<u>David Wehner</u> Current CFO; Former VP Corporate Finance and Business Planning	Mr. Wehner is likely to have discoverable information regarding social networks and social media applications; Facebook's use of consumer data to evaluate Facebook's competitive performance; Facebook's serial acquisition strategy; Facebook's Platform Policy and Partnership Agreements; Facebook's advertising business practices; agreements with competitors and potential competitors (including the Google Network Bidding Agreement); Facebook's data collection and use practices; the representations Facebook made to the public regarding the Platform, and Facebook's data collection and use practices; Facebook's monetization strategy; and/or the effects that Facebook's conduct had on competing social networks and social media applications.
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21	<u>Daniel Su</u> Current Director and Associate General Counsel	Mr. Su is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
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25	<u>Ash Jhaveri</u> Current VP, Emerging Platforms	Mr. Jhaveri is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
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2	<u>David Jakubowski</u>	Mr. Jakubowski is likely to have discoverable
3	Former Head of Data & Analytics, Emerging	information regarding agreements with
4	Business & Partnerships; Former Employee,	competitors and potential competitors
5	Adtech, Measurement, Data, Publisher	(including the Google Network Bidding
6	Solutions	Agreement); and/or Facebook's advertising
7		business practices.
8	<u>Brian Boland</u>	Mr. Boland is likely to have discoverable
9	Former VP Partnership Product Marketing,	information regarding agreements with
10	Strategic Operations, Partner Engineering and	competitors and potential competitors
11	Analytics; Former VP Publisher Solutions;	(including the Google Network Bidding
12	Former VP Advertising Technology; Former	Agreement); and/or Facebook's advertising
13	VP Ads Product Marketing and Atlas; Former	business practices.
14	Director, Product Marketing	
15	<u>Henry Erskine Crum</u>	Mr. Crum is likely to have discoverable
16	Current Director of Product Management	information regarding agreements with
17		competitors and potential competitors
18		(including the Google Network Bidding
19		Agreement); and/or Facebook's advertising
20	<u>Doug Stotland</u>	Mr. Stotland is likely to have discoverable
21	Former Director of Sales Operations for	information regarding agreements with
22	Marketing Science and Publisher Solutions;	competitors and potential competitors
23	Former Product Marketing Director, Local	(including the Google Network Bidding
24	and Pages; Former Head of Advertising Sales	Agreement); and/or Facebook's advertising
25	for Asia Pacific; Former Head of Global	business practices.
26	Pricing, Yield Management and Measurement	
27	<u>Eric Meyerson</u>	Mr. Meyerson is likely to have discoverable
28	Former Director of Marketing, Media, &	information regarding agreements with
	Video	competitors and potential competitors
		(including the Google Network Bidding
		Agreement); and/or Facebook's advertising
		business practices.
	<u>Nick Grudin</u>	Mr. Grudin is likely to have discoverable
	Current VP, Media Partnerships	information regarding agreements with
		competitors and potential competitors
		(including the Google Network Bidding
		Agreement); and/or Facebook's advertising
		business practices.

1 2 3 4	<u>Tom Channick</u> Current Corporate Communications Manager, Advertising and Business Integrity	Mr. Channick is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
5 6 7 8	<u>Eric Johnson</u> Current Data Scientist / Economist	Mr. Johnson is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
9 10 11 12	<u>Damian Burns</u> Former Senior Director of Gaming EMEA; Former Global Head of Sales, Atlas by Facebook	Mr. Burns is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
13 14 15 16	<u>Elliot Sharage</u> Current VP of Communications and Public Policy	Mr. Sharage is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
17 18 19 20 21	<u>Rob Goldman</u> Former VP, Ads; Former Director of Product Ads, and Pages; Former Ads Growth Employee	Mr. Goldman is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
22 23 24 25	<u>Ty Ahmad-Taylor</u> Current VP, Ads Product Marketing	Mr. Ahmad-Taylor is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding Agreement); and/or Facebook's advertising business practices.
26 27 28	<u>Yoav Arnstein</u> Current Director of Product Management; Former Product Marketing Director – Facebook App; Former Product Marketing	Mr. Arnstein is likely to have discoverable information regarding agreements with competitors and potential competitors (including the Google Network Bidding

1	Director – Facebook Publisher Solutions; Former EMEA & LATAM Director – Facebook Publisher Solutions	Agreement); and/or Facebook’s advertising business practices.
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3	<u>Prashant Fuloria</u> Former Senior Director of Product Management	Mr. Fuloria is likely to have discoverable information regarding Facebook’s advertising business practices.
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5	<u>Tim Kendall</u> Former Director of Monetization	Mr. Kendall is likely to have discoverable information regarding Facebook’s advertising business practices.
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7	<u>Hongyan Zhou</u> Current Engineering Manager, Ads	Mr. Zhou is likely to have discoverable information regarding Facebook’s advertising business practices.
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9	<u>Andrew Lackman</u> Current Data Scientist Manager; Former Data Scientist	Mr. Lackman is likely to have discoverable information regarding Facebook’s advertising business practices.
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11	<u>Spencer Beecher</u> Current Data Scientist / Manager, Ads Delivery	Mr. Beecher is likely to have discoverable information regarding Facebook’s advertising business practices.
12		
13	<u>Mary Ku</u> Current Director of Product Management, Ads Delivery	Ms. Ku is likely to have discoverable information regarding Facebook’s advertising business practices.
14		
15	<u>Charlotte Naraez</u> Current Product Manager Director	Ms. Naraez is likely to have discoverable information regarding Facebook’s advertising business practices.
16		
17	<u>Rob Goldman</u> Former VP, Ads; Former Director of Product, Ads, and Pages; Former Ads Growth Employee	Mr. Goldman is likely to have discoverable information regarding Facebook’s advertising business practices.
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19	<u>Artur Abdullin</u> Current Senior Staff Data Scientist; Former Data Scientist, Ads	Mr. Abdullin is likely to have discoverable information regarding Facebook’s advertising business practices.
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21	<u>Jon Eide</u> Current Director, Head of Monetization Applied Research and Strategy	Mr. Eide is likely to have discoverable information regarding Facebook’s advertising business practices.
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2	<u>Dan Levy</u>	Mr. Levy is likely to have discoverable
3	Current VP, Ads & Business Platform;	information regarding Facebook's advertising
4	Former VP, Small Business; Former Director	business practices.
5	– Payments, Risk, and Finance	
6	<u>Jeff Kanter</u>	Mr. Kanter is likely to have discoverable
7	Former Product Management Lead,	information regarding Facebook's advertising
8	Instagram; Former Product Management;	business practices.
9	Former Product Marketing Manager &	
10	Strategist	
11	<u>Greg Badros</u>	Mr. Badros is likely to have discoverable
12	Former VP of Engineering and Products	information regarding Facebook's advertising
13		business practices.
14	<u>Jeff Amlin</u>	Mr. Amlin is likely to have discoverable
15	Former Data Analytics Manager	information regarding Facebook's advertising
16		business practices.
17	<u>Will Carthcart</u>	Mr. Carthcart is likely to have discoverable
18	Current Head of WhatsApp; Former VP,	information regarding Facebook's advertising
19	Product Management	business practices.
20	<u>Jinghao Yan</u>	Mr. Yan is likely to have discoverable
21	Current Software Engineer, Ads	information regarding Facebook's advertising
22		business practices.
23	<u>Brian Hale</u>	Mr. Hale is likely to have discoverable
24	Former VP, Product Growth; Former	information regarding Facebook's advertising
25	Director, Product Growth; Former Manager,	business practices.
26	Growth Marketing & Analytics	
27	<u>Matthew Idema</u>	Mr. Idema is likely to have discoverable
28	Former VP, Product Marketing, Ads and	information regarding Facebook's advertising
	Business Products	business practices.
	<u>Emily White</u>	Ms. White is likely to have discoverable
	Former Instagram Director of Business	information regarding Facebook's advertising
	Operations; Former Facebook Director of	business practices.
	Mobile Partnerships	



1	<u>Chuan She</u> Former User Experience Research Lead for FB Ads	Ms. She is likely to have discoverable information regarding Facebook's advertising business practices.
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3	<u>Joanna Lee</u> Former Business Development, Mobile Partnerships Employee	Ms. Lee is likely to have discoverable information regarding Facebook's advertising business practices.
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6	<u>Denise Moreno</u> Current VP, Product Growth	Ms. Moreno is likely to have discoverable information regarding Facebook's advertising business practices.
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8	<u>Koun Han</u> Former Product Manager, Pages; Former Monetization Analytics, Manager	Ms. Han is likely to have discoverable information regarding Facebook's advertising business practices.
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10	<u>Debbie Frost</u> Former VP, Global Communications and Public Affairs	Ms. Frost is likely to have discoverable information regarding Facebook's advertising business practices.
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13	<u>Nick Gianos</u> Former Manager, Strategic Partnerships – Marketing Technology; Former Monetization Partnerships Employee; Former Platform Developer Relations Employee; Former Analyst, User Privacy	Mr. Giano is likely to have discoverable information regarding Facebook's advertising business practices.
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17	<u>Brandon McCormick</u> Former Director of Global Communications – Monetization	Mr. McCormick is likely to have discoverable information regarding Facebook's advertising business practices.
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19	<u>Mike Fox</u> Former Director of Marketing	Mr. Fox is likely to have discoverable information regarding Facebook's advertising business practices.
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22	<u>Brad Smallwood</u> Current Head of Measurement and Pricing	Mr. Smallwood is likely to have discoverable information regarding Facebook's advertising business practices.
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24	<u>Mike Hoefflinger</u> Former Director of Global Business Marketing	Mr. Hoefflinger is likely to have discoverable information regarding Facebook's advertising business practices.
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1	<u>Mike Murphy</u> Current Account Manager	Mr. Murphy is likely to have discoverable information regarding Facebook's advertising business practices.
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3	<u>Reid Rokitta</u> Former Regional Director, Account Management – Sales	Mr. Rokitta is likely to have discoverable information regarding Facebook's advertising business practices.
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5	<u>Ami Vora</u> Former VP/Director, Ads; Former Director, Mobile Marketing; Former Manager, Ads; Former Facebook Platform Employee	Ms. Vora is likely to have discoverable information regarding Facebook's advertising business practices.
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9	<u>Kent Schoen</u> Former Lead Product Manager, Monetization; Former Director, Product Marketing; Former Director, Engineering	Mr. Schoen is likely to have discoverable information regarding Facebook's advertising business practices.
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13 **C. Non-Parties**

14	<b>Name</b>	<b>Subject of Discoverable Information</b>
15	Airbiquity Inc. 1191 Second Avenue, Suite 1900	Airbiquity is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
16	Seattle, WA 98101 (206) 219-2700	
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19	Foursquare Labs Inc. 50 West 23rd Street, 8th Floor	Foursquare Labs is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
20	New York, NY 10010 (646) 380-4813	
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23	Google LLC 1600 Amphitheatre Parkway	Google LLC is likely to have discoverable information related to social media networks and markets; agreements with Facebook (including the Google Network Bidding Agreement); Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
24	Mountain View, California 94043 (650) 253-0000	
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1 2 3 4	Hinge c/o Match Group, Inc. 8750 North Central Expressway Suite 1400 Dallas, Texas 75231 (214) 576-9352	Hinge is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
5 6 7 8 9	Kakao 35 Hanbuk-ro, Jeju-si Jeju, Jeju, 63309 South Korea +82-18991326	Kakao is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; competitively-motivated exclusion from Facebook advertising; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
10 11 12 13 14	LINE Corporation c/o NAVER Corporation NAVER Green Factory 6 Buljeong-ro, Bundang-gu Seongnam-si, Gyeonggi Province, South Korea +82-3115883830	LINE is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; competitively-motivated exclusion from Facebook advertising; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
15 16 17 18 19	LinkedIn Corp. 2029 Stierlin Court Mountain View, CA 94043 (650) 687-3600	LinkedIn is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
20 21 22 23	Netflix, Inc. 100 Winchester Cir. Los Gatos, CA 95032(408) 540-3700	Netflix is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
24 25 26 27 28	Pinterest, Inc. 505 Brannan Street San Francisco, California 94107 (415) 762-7100	Pinterest is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.

1 2 3 4	Royal Bank of Canada 200 Bay Street Toronto, Ontario M5J 2W7 +1-416-842-7575	Royal Bank of Canada is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
5 6 7 8	Snap Inc. 63 Market Street Venice, California 90291 (310) 399-3339	Snap Inc. is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
9 10 11 12	Tinder c/o Match Group, Inc. 8750 North Central Expressway Suite 1400 Dallas, Texas 75231 (214) 576-9352	Tinder is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
13 14 15 16	Twitter, Inc. 1355 Market Street, Suite 900 San Francisco, California 94103 (415) 222-9670	Twitter is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.
17 18 19 20 21	WeChat c/o Tencent Holdings Ltd. Tencent Binhai Building, No. 33, Haitian Second Road, Nanshan District, Shenzhen 518054 China +86-755-86013388	WeChat is likely to have discoverable information related to social media networks and markets; agreements with Facebook; Facebook acquisitions; competitively-motivated exclusion from Facebook advertising; use of their data by Facebook; and/or Facebook's Platform Partnerships and Platform Policy.

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**II. FED. R. CIV. P. 26(a)(1)(A)(i): DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS THAT ADVERTISER PLAINTIFFS HAVE IN THEIR POSSESSION, CUSTODY, OR CONTROL AND MAY USE TO SUPPORT ITS CLAIMS**

25 Advertiser Plaintiffs disclose the following documents in their possession, custody, or control  
26 that they may use to support their claims:

- 27 i. Documents concerning Advertiser Plaintiffs' purchases of social advertising.
- 28

- ii. Documents produced to Advertiser Plaintiffs pursuant to the Court's April 2, 2021 order (ECF No. 82), maintained by counsel.

### **III. FED. R. CIV. P. 26(a)(1)(A)(iii): COMPUTATION OF DAMAGES CLAIMED BY ADVERTISER PLAINTIFFS**

Advertiser Plaintiffs seek, on behalf of themselves and members of the Advertiser Classes (as defined in the Consolidated Advertiser Class Action Complaint ("CAC")), to recover compensatory damages (to be trebled), costs and attorneys' fees, pre- and post-judgment interest, and any other relief that the Court may deem just and proper.

Advertiser Plaintiffs allege that their damages arise from overcharges paid to Facebook for advertising on Facebook's social network. Advertiser Plaintiffs bring claims under Sections 1 and 2 of the Sherman Act and are seeking damages arising from the alleged monopolist and conspirator, Facebook, imposing higher advertising costs than would be charged in a competitive market. Advertiser Plaintiffs' damages theory is widely accepted and can be expressed in simplified form as: [Dollar Overcharge =  $(P_m - P_c) \times Q_m$ ] where  $P_m$  is the price charged for advertising,  $P_c$  is the but-for or competitive price charged for advertising, and  $Q_m$  is the quantity of advertising sold by Facebook to class members during the class period.<sup>1</sup> The difference between  $P_c$  and  $P_m$  is known as the "overcharge."

Considering the typical overcharge caused by anticompetitive conduct of the kind alleged in the CAC,<sup>2</sup> Plaintiffs presently believe that Facebook's anticompetitive conduct resulted in an overcharge of at least 20%, suggesting Advertiser Class Members' damages are at least \$22.6 billion

<sup>1</sup> Connor, John. (2014). Price-Fixing Overcharges: Revised 3rd Edition. SSRN Electronic Journal. 10.2139/ssrn.2400780 at 7.

<sup>2</sup> Lande, Robert H. and Connor, John M., Cartel Overcharges and Optimal Cartel Fines (October 16, 2008). SSRN Electronic Journal: <http://dx.doi.org/10.2139/ssrn.1285455>; European Commission, *Practical Guide: Quantifying Harm in Actions for Damages Based on Breaches of Article 101 or 102 of the Treaty on the Functioning of the European Union*, Nov. 6, 2013, [https://ec.europa.eu/competition/antitrust/actionsdamages/quantification\\_en.html](https://ec.europa.eu/competition/antitrust/actionsdamages/quantification_en.html).

(before trebling) based on Facebook's publicly reported U.S. advertising revenues (over \$135.7 bn) during the Class Period.<sup>3</sup>

Each named Plaintiff's damages (before trebling) are presently estimated to be equal to a 20% overcharge on the total value of advertising purchased by that Plaintiff from Facebook during the Class Period. Based on their investigation to date, Plaintiffs believe that their total spend on affected Facebook advertising and associated damages (before trebling) to be at least:

Plaintiff	Total value of Facebook advertising during Class Period <sup>4</sup>	Damages (before trebling)
Mark Young	\$81.49	\$13.58
Mark Berney	\$770.00	\$128.33
406 Property Services LLC	\$392.32	\$65.39
Joshua Jeon	\$6.98	\$1.16
Katherine Looper	\$1,101.23	\$183.54
Jessyca Frederick	\$211.01	\$35.17
Affilious	\$4,735.28	\$789.21

Advertiser Plaintiffs will produce separately before September 10 the records located to date of the named Plaintiffs' Class Period advertising purchases from Facebook, pursuant to Rule 26(a)(1)(A)(iii).

As Advertiser Plaintiffs' investigation proceeds, and as the necessary discovery from Facebook and non-parties is completed and the necessary information and data are disclosed, Advertiser Plaintiffs will supplement these First Amended Initial Disclosures. Exact measures and computations of Advertiser Plaintiffs' and the proposed classes' damages will require expert analysis and testimony. Advertiser Plaintiffs intend to provide an expert report on damages pursuant to Rule 26(a)(2) on or before September 23, 2022 (the date for opening expert reports – *see* ECF No. 82). Advertiser Plaintiffs anticipate that their damages experts will use various econometric tools

<sup>3</sup> Estimate derived from Facebook's Class Period Form 10-Ks filed with the SEC. Facebook's Form 10-Ks report revenue derived from customers with a U.S. billing address and provide a breakdown of the proportion of Facebook's total revenue derived from advertising sales as opposed to other revenue streams.

<sup>4</sup> For the avoidance of doubt, Plaintiffs' investigation of their own records remains ongoing. Consequently, Plaintiffs reserve their right to update and supplement these disclosures as appropriate as their investigation continues.

including, among other things, multivariate regressions to articulate a formula for computing damages.

#### IV. FED. R. CIV. P. 26(a)(1)(A)(iv): INSURANCE

Advertiser Plaintiffs aver that the information sought by Rule 26(a)(1)(A)(iv) is inapplicable to Advertiser Plaintiffs.

Dated: August 27, 2021

Respectfully submitted,

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